

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BRIAN THOMPSON, individually;  
and  
JENNIFER JAMES, individually,  
  
Plaintiffs,  
  
v.  
  
J. GRAY TEEKELL, individually;  
THE TEEKELL COMPANY, INC.;  
MICHAEL E. KRASNOW, Trustee  
of Morton Family Irrevocable Trust, and  
RYAN TAYLOR MORTON,  
individually.  
  
Defendants.

Case No. CIV-23-1074-R

**UNOPPOSED MOTION OF PLAINTIFFS FOR EXTENSION OF TIME TO RESPOND  
TO DEFENDANT MICHAEL E. KRASNOW'S MOTION TO DISMISS  
SECOND AMENDED COMPLAINT**

Pursuant to LCvR 7.1(h), Plaintiffs, Brian Thompson and Jennifer James (“Plaintiffs”), respectfully request the Court to extend the time in which they may file a Response to Defendant Krasnow’s Motion to Dismiss Second Amended Complaint [Doc. No. 23] (the “Motion”) until May 20, 2024. In support of this Motion, Plaintiffs show the Court as follows:

1. Defendant Krasnow filed his Motion on April 19, 2024.
2. Without the extension of time requested herein, Plaintiffs' response to the Motion would be due on or before May 10, 2024.
3. Plaintiffs are asking the deadline for their response be extended an additional 10 days, or until May 20, 2024.

4. The additional time requested is needed to prepare an adequate response to the Motion.

5. Plaintiffs' have made no previous request for an extension of time to file a pleading responsive to the Motion.

6. Counsel for Plaintiffs are authorized to state that Defendant Krasnow does not oppose the requested extension.

7. This Motion is made in good faith and without the intention to hinder or delay the proceedings. No Scheduling Order has been entered in this proceeding, and the granting of the requested extension will not impact other deadlines.

8. Plaintiffs have submitted an Order granting the relief requested herein for entry by the Court.

WHEREFORE, Plaintiffs respectfully requests the Court to enter an Order extending the deadline within which they may file a responsive pleading to Defendant Krasnow's Motion to Dismiss Second Amended Complaint until May 20, 2024.

Date: April 24, 2024.

Respectfully submitted,

*s/Shannon F. Davies*

Shannon F. Davies, OBA No. 16979

Johnny G. Beech, OBA No. 655

Spencer Fane LLP

9400 North Broadway Extension, Suite 600

Oklahoma City, Oklahoma 73114

Telephone: (405) 844-9900

Facsimile: (405) 844-9958

Email: [sdavies@spencerfane.com](mailto:sdavies@spencerfane.com)

Email: [jbeech@spencerfane.com](mailto:jbeech@spencerfane.com)

***Attorneys for Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of April 2024, a true and correct copy of the above and foregoing document was filed electronically with the Clerk of Court via the CM/ECF system which will send notifications of such filing to all counsel of record:

Kurt M. Rupert, OBA No. 11982  
Taylor K. Weder, OBA No. 34045  
HARTZOG CONGER CASON  
Email: [krupert@hartzoglaw.com](mailto:krupert@hartzoglaw.com)  
Email: [tweder@hartzoglaw.com](mailto:tweder@hartzoglaw.com)  
***Attorneys for Defendant Michael E. Krasnow***

Timothy B. Soefje, OBA No. 33342  
Alex Gebert, OBA No. 34594  
FREEMAN MATHIS & GARY, LLP  
Email: [Tim.Soefje@fmglaw.com](mailto:Tim.Soefje@fmglaw.com)  
Email: [Alex.Gebert@fmglaw.com](mailto:Alex.Gebert@fmglaw.com)  
***Attorney for Defendants J. Gray Teekell and  
The Teekell Company, Inc.***

Teddy Abbott, OBA No. 14367  
ABBOTT LAW OFFICE, LLC  
[Teddy.abbott@outlook.com](mailto:Teddy.abbott@outlook.com)  
***Local Counsel for Defendants J. Gray Teekell  
And the Teekell Companies, Inc.***

s/Shannon F. Davies

Shannon F. Davies